

August 29, 2024

VIA CM/ECF

Honorable J. Brendan Day
United States District Court for the District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, NJ 08608

Re: *MacLean, et al. v. Wipro Limited, No. 3:20-3414-GC-JBD*

Dear Judge Day:

The parties in the above-captioned matter write in advance of the telephonic status conference scheduled for Thursday, September 5, 2024. *See* Dkt. 63 at 5.

Since the June 4, 2024 hearing, in accordance with the Court's June 11, 2024 Order, the parties have been conferring regarding appropriate custodians, during which, the parties have been discussing what backups exist for potential custodians. *See id.* 63 at 1-2. The parties have also been conferring regarding a sampling of payroll data that Wipro shall collect and produce. *See id.* at 4.

The parties agree that additional time is needed to confer regarding these issues in an attempt to resolve and/or ripen them for presentation to the Court. Given the parties' ongoing conferral efforts, the parties jointly request that the Court adjourn the September 5 conference until after the parties have had an opportunity to complete this meet and confer process. Plaintiffs' counsel has a two-week trial scheduled to begin on September 24, 2024. The parties therefore believe that the outstanding issues (if any) will be ripe for the Court's attention by mid-October, and therefore respectfully request that the conference be adjourned until that time. Of course, if Your Honor would like the parties to appear on September 5, they will be prepared to do so.

The parties thank Your Honor for his attention to this matter.

Respectfully submitted,

/s/ Jonathan Rudnick
Jonathan Rudnick
Daniel Kotchen (*pro hac vice*)

Attorneys for Plaintiffs and Putative Class

/s/ Stephanie Silvano
Stephanie Silvano
Greta Williams (*pro hac vice*)

Attorneys for Defendant Wipro Limited

Joint Letter to Judge Day
August 29, 2024

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on all counsel of record by electronic service through the Court's CM/ECF system.

By: /s/ *Stephanie Silvano*